

# **EXHIBIT 2**

## Keaton, Andrea

---

**From:** Rick Blanke <rblanke@ugbblaw.com>  
**Sent:** Tuesday, October 19, 2021 2:29 PM  
**To:** McMillen, Joy D.; Norwood, Ronald A.  
**Cc:** 'hamiltons@stlouis-mo.gov'; Paul Schmitz  
**Subject:** [EXTERNAL] RE: James Garavaglia v. City of St. Louis, et al.

Ron & Joy,

Neither I, nor my partner Paul Schmitz, are available for depositions on December 6<sup>th</sup>. We will be back with some good dates, or exclusion dates, as soon as we can verify the same with our client. Meanwhile, be advised that we also wish to depose your client, Ms. Green.  
Thank you.

Richard B. Blanke



"Maximizing the Power of Partnerships"

906 Olive Street (Frisco Bldg), Suite 300, St. Louis, Missouri 63101-1426

Web Site: [ugbblaw.com](http://ugbblaw.com)

Phone: (314) 621-9550 [Ext.130] ▪ Fax: (314) 621-2697 ▪ Email: [rblanke@ugbblaw.com](mailto:rblanke@ugbblaw.com)

The message included with this e-mail and any attached document(s) contains information from the law firm of Uthoff, Graeber, Bobinette & Blanke (UGBB) which is confidential and/or privileged. This information is intended to be for the use of the addressee named. If you are not the addressee, note that any disclosure, retransmission, dissemination, photocopying, distribution or use of the contents of this e-mail information is prohibited. If you received this transmission in error, please reply to the sender to advise of the error and then delete this transmission and any attachments. Thank you for your cooperation.

*Note that: (1) email communications are not a secure method of communication, (2) any email that is sent to you or by you may be copied and held by various computers it passes through as it goes from sender to recipient, (3) persons not participating in our communication may intercept our communications by improperly accessing your computer or mine or even some computer unconnected to either of us which the email passes through. I am communicating to you via email because you have consented to receive communications via this medium in your agreement with our firm. If you change your mind, and want future communications to be sent in a different manner, please advise our offices.*



*Please consider the environmental impact when determining whether to print this e-mail message. Thank you.*

---

**From:** McMillen, Joy D. <JMcMillen@lewisrice.com>  
**Sent:** Monday, October 18, 2021 5:00 PM  
**To:** Rick Blanke <rblanke@ugbblaw.com>; Paul Schmitz <pschmitz@ugbblaw.com>  
**Cc:** 'hamiltons@stlouis-mo.gov' <hamiltons@stlouis-mo.gov>; Norwood, Ronald A. <rnorwood@lewisrice.com>  
**Subject:** James Garavaglia v. City of St. Louis, et al.

Rick,

Please find attached hereto Defendant Darlene Green's First Request for Production of Documents Directed to Plaintiff and a Notice of Deposition for Plaintiff's Deposition. Please note that if the date and time specified in the deposition do not work for you and/or Mr. Garavaglia, please provide us with some alternative available deposition dates by next Monday.

Thanks,

**LEWIS RICE**

**Joy D. McMillen**

[jmcmillen@lewisrice.com](mailto:jmcmillen@lewisrice.com)

600 Washington Avenue

Suite 2500

St. Louis, Missouri 63101-1311

314.444.7703 (direct)

314.612.7703 (fax)

[www.lewisrice.com](http://www.lewisrice.com)

---

This message, including attachments, is from the law firm of Lewis Rice LLC. This message contains information that may be confidential and protected by the attorney-client or attorney work product privileges. If you are not the intended recipient, promptly delete this message and notify the sender of the delivery error by return e-mail or call us at 314-444-7600. You may not forward, print, copy, distribute, or use the information in this message if you are not the intended recipient.